Kubo, Teresa

From: Teresa Kubo [Kubo.Teresa@epamail.epa.gov]
Sent: Thursday, June 20, 2013 11:14 AM
To: Kubo, Teresa
Subject: Fw: BPA substation

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----- Forwarded by Teresa Kubo/R10/USEPA/US on 06/20/2013 11:13 AM -----

From: Chip Humphrey/R10/USEPA/US
To: Teresa Kubo/R10/USEPA/US@EPA,
Date: 01/18/2013 05:00 PM
Subject: BPA substation

Teresa - see my suggestions below. Be glad to talk next week anytime.

Chip

Hi Chip -

I am getting around to combing through the BPA I-5 corridor reinforcement project. All of the action alternatives propose to utilize part of the Reynolds property for a new substation (the Sundial Substation). In addition, lines and access roads would cross a portion of the site. I have included graphics below, as well as their write up for the Reynolds site. Based on their analysis, they conclude there would be "Low impact there the alternatives cross the Reynolds Metals Superfund Site. EPA and ODEQ consider current health risk acceptable."

They note that special care may be needed during excavation for the substation and towers. Before construction, they would notify EPA and DEQ and "plans would be in place to address and mitigate any known or potential areas of contamination that may be encountered". My questions for you are:

1) Are you satisfied with the way in which the site has been characterized in the analysis?

I think it should acknowlege that habitat restoration was completed in a 21 acres area adjacent to Company Lake (a portion of the Outside the Dike area) as part of a Natural Resource Damage Settlement, and that a permanent preservation easement was put in place to protect the area. The current BPA easement trumps that easement, but I'm not sure if all the activities are limiited to BPA's current easement in this area.

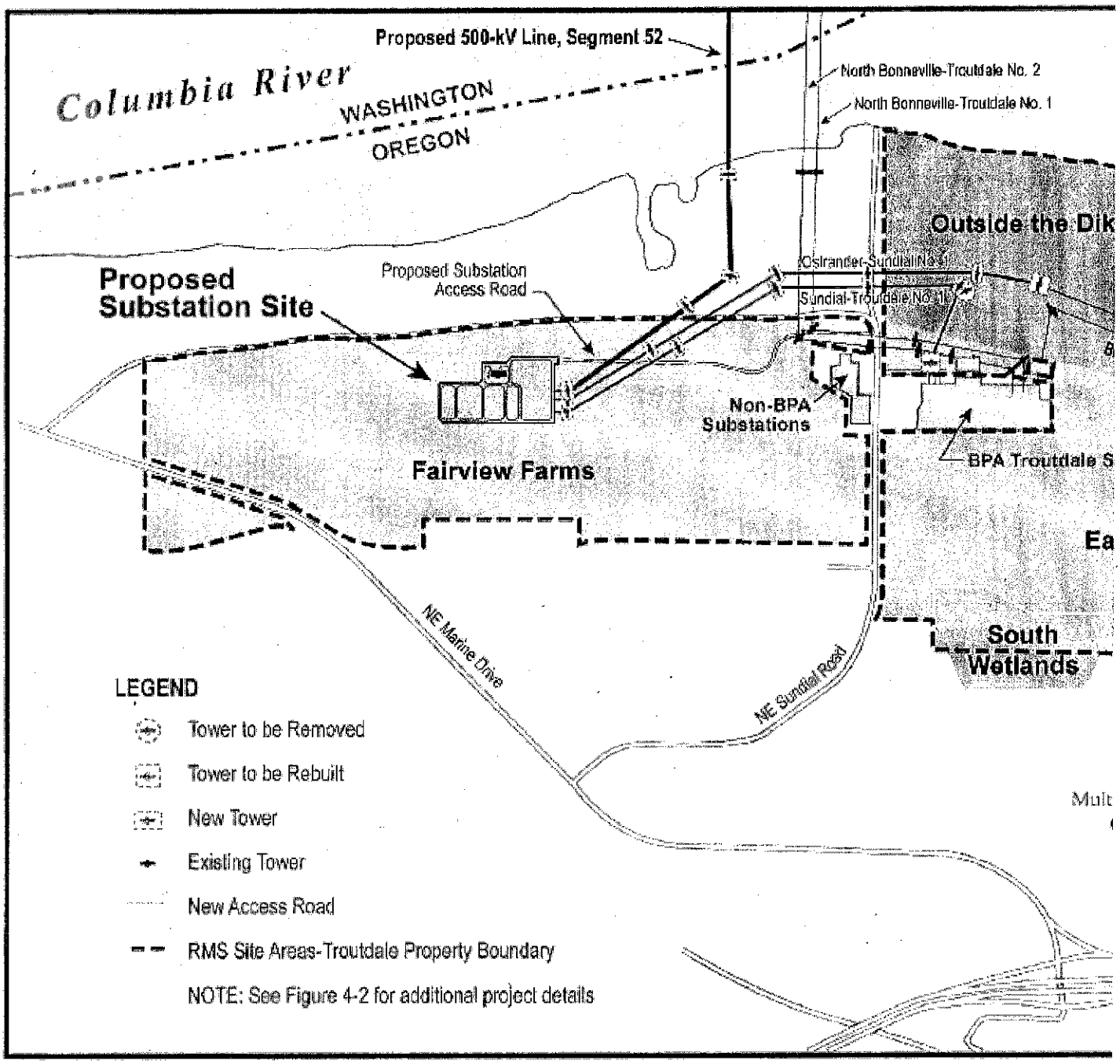
2) They have not done any additional sampling of the proposed construction site and it is not clear how they will determine the extent to which "special care" should be taken during the excavation and construction process. Do you have any recommended actions they should take prior to construction? If we want them to do any additional sampling we should put that in writing.

Based on our previous investigations and site history, we wouldn't expect any significant contamination in the area shown for the proposed substation site.

We will need to make sure they follow through with their notification to DEQ and EPA prior to construction work and plans will be put in place to address any contamination - this is covered under the substation section but is probably a bigger deal for the tower footings given their proposed locations. Since it looks like this is conceptual at this stage, it's probably better dealt with it when they have firmed up the actual locations for the towers and substation. It generally looks OK right now, but there are definite areas to avoid.

The comment period is open until March 1, but it would be nice to get comments out mid February if not sooner. Thanks in advance for any feedback Chip!

Figure 10-2 Reynolds Metal Company Site



Kubo, Teresa

From: Teresa Kubo [Kubo.Teresa@epamail.epa.gov]
Sent: Thursday, June 20, 2013 11:14 AM
To: Kubo, Teresa
Subject: Fw: Reynolds and the I-5 Corridor Reinforcement Project

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From: Teresa Kubo/R10/USEPA/US
To: Chip Humphrey/R10/USEPA/US@EPA,
Date: 01/17/2013 03:09 PM
Subject: Reynolds and the I-5 Corridor Reinforcement Project

Hi Chip -

I am getting around to combing through the BPA I-5 corridor reinforcement project. All of the action alternatives propose to utilize part of the Reynolds property for a new substation (the Sundial Substation). In addition, lines and access roads would cross a portion of the site. I have included graphics below, as well as their write up for the Reynolds site. Based on their analysis, they conclude there would be "Low impact there the alternatives cross the Reynolds Metals Superfund Site. EPA and ODEQ consider current health risk acceptable."

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1) Are you satisfied with the way in which the site has been characterized in the analysis?
2) They have not done any additional sampling of the proposed construction site and it is not clear how they will determine the extent to which "special care" should be taken during the excavation and construction process. Do you have any recommended actions they should take prior to construction? If we want them to do any additional sampling we should put that in writing.

The comment period is open until March 1, but it would be nice to get comments out mid February if not sooner. Thanks in advance for any feedback Chip!

Figure 10-2 Reynolds Metal Company Site

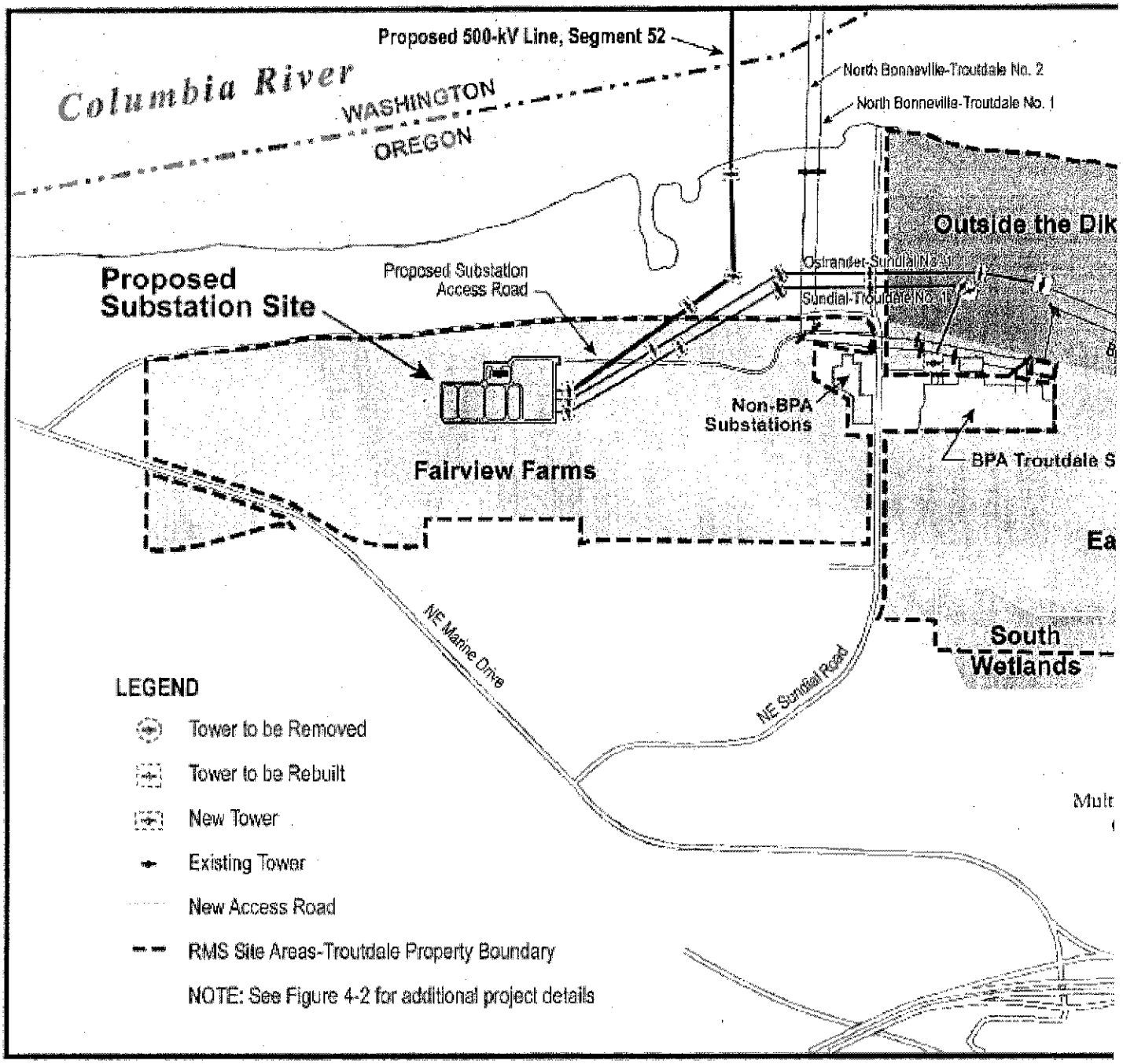
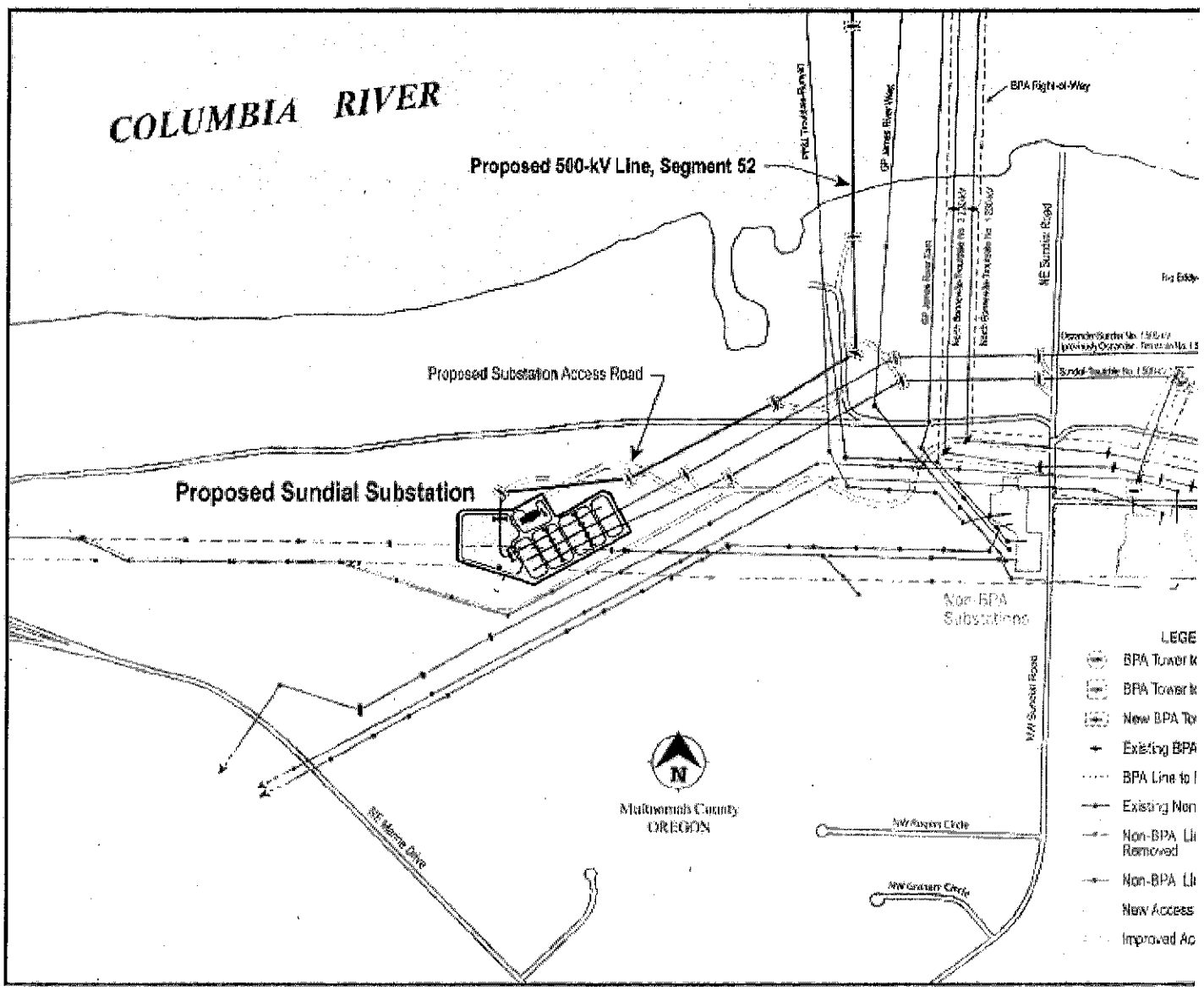


Figure 4-2 Sundial Substation



10.1.2 Toxic and Hazardous Substances

Portions of the action alternatives are in rural, undeveloped areas where the risk of encountering unreported **hazardous waste** sites or unreported contamination is possible, but highly unlikely. These sites may include illegal dump sites, illicit drug labs, buried drum sites, unreported chemical spills, abandoned industrial properties, or old landfills. In more developed areas, including urban areas, contaminated sites are generally identified and listed with regulatory agencies.

Three hazardous waste and contaminated sites reported to environmental regulatory agencies (U.S. Environmental Protection Agency [EPA], Washington State Department of Ecology [Ecology], Oregon Department of Environmental Quality [ODEQ], and local health departments) are crossed by one or more of the action alternatives:

- BPA's Ross Complex: West Alternative
- International Paper Company Mill and Solid Waste Site: Central Alternative
- Reynolds Metals Site: all action alternatives

10.1.2.3 Reynolds Metals Company Site

The Reynolds Metals Company (RMC) site is an active NPL or "Superfund" site about 20 miles east of Portland and about 1 mile north of Troutdale on Port of Portland property. The proposed Sundial substation site is on part of this Superfund site, requiring the transmission line route for all action alternatives to cross a portion of it.

Reynolds Metals Company operated as a primary aluminum reduction plant where aluminum was produced from the raw material alumina. The aluminum plant occupied about 108 acres of the 800-acre RMC site. The plant operated from 1941 until fall 2000 when it was closed by its owner Alcoa. The plant buildings were demolished from 2003 through January 2006. The Port of Portland acquired the site from Alcoa in 2008.

The RMC site was placed on the NPL in December 1994. Cleanup of several waste areas began in 2003. Cleanup of fluoride-contaminated groundwater began in 2005. Plant demolition and additional soil cleanup was done between 2003 and 2006.

In 2006 the RMC site was divided into four areas for post-demolition investigation and evaluation of site soil conditions (see Figure 10-2). Three of these areas could be affected by the project:

- Fairview Farms (location of Sundial Substation, new line, connector lines, access roads, and non-BPA lines to be re-routed [see Figure 4-2 for most project detail])
- Outside the Dike (location of connector lines and access roads)
- East Area (former plant, location of connector lines)

Early cleanup actions at Fairview Farms between 1995 and 2002 included excavating and disposing of 150 tons of debris from four piles to a permitted off-site disposal facility. Cleanup actions within the Outside the Dike area between 1993 and 2001 included the excavation and removal of 93,854 tons of process residue and sediment from the Company Lake portion of this area. Extensive removal actions within the East Area included the main RMC plant. Remedial actions within the northwestern portion of the East Area included the removal of a wooden wastewater pipeline and 28 tons of material.

Groundwater contamination at the RMC site was caused by fluoride leaching from former waste areas at the East Area (former plant) and the Outside the Dike area. Source areas of groundwater contamination were removed during remedial actions between 2002 and 2005. A fluoride-contaminated groundwater plume (northern plume) remained at depths from 30 to 100 feet below ground surface. An extraction/production well system was installed in 2005. Since that time the concentration levels in some monitoring wells near the source areas have begun to show a downward trend.

The post-demolition risk assessment (RA) done in 2006 addressed possible future land use of the area as a mixed-use general industrial complex consistent with existing industrial zoning. The RA considered the potential for soil exposure to future site users: site trespassers, recreational users, construction workers, excavation/trench workers, and standard occupational workers. The RA's human health risk assessment concluded that soils within all three areas were within the EPA's and ODEQ's acceptable risk range for all contaminants.

10.2.2.3 Sundial Substation

The Sundial substation site, the end of Segment 52 south of the Columbia River, and connector lines between the Sundial substation site and BPA's existing Troutdale Substation would be constructed within three areas of the RMC site (see Section 10.1.2.3, Reynolds Metals Company Site). The post-demolition RA human health risk assessment conducted in 2006 concluded that soils in the three areas were within the EPA's and ODEQ's acceptable risk range for all contaminants. Regardless, special care may need to be taken during excavation for the substation and towers. Before construction work would begin, EPA and ODEQ would be notified and plans would be in place to address and mitigate any known or potential areas of contamination that may be encountered. Because information about known contaminants is available for the three sites, debris and contaminated soil has been removed, and the existing health risk levels are considered acceptable by EPA and ODEQ, impacts would be low.

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